



*Protecting our lands and waters for generations to come*

February 3, 2012

Gerry O'Keefe  
Executive Director  
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Dear Mr. O'Keefe:

Great Peninsula Conservancy appreciates this opportunity to comment on the Puget Sound Partnership's draft Action Agenda update. Our comments will focus on forest conservation, specifically models for working comprehensively at a landscape and watershed scale within our land trust's geography.

#### **Upland and Terrestrial Considerations for Forest Conservation**

Great Peninsula Conservancy would like to call out the importance of upland forests to groundwater recharge and downstream water quality. While important across all regions, this is especially critical for the Kitsap Peninsula, and other areas such as Whidbey, Camano and San Juan Islands, where precipitation is the sole source for our potable water supply and stream flow. We support PSP's target of reducing land development pressure based on loss of vegetative cover (page 32).

#### **Action Areas- Feedback on Forest Conservation**

Great Peninsula Conservancy supports the inclusion of the Kitsap Forest & Bay Project (Port Gamble conservation) on the Puget Sound Partnership's regional Near Term Action list (A2.1 NTA 5 and 6, page 483), as well as on the Near Term Action lists for both North Central/West Sound and Hood Canal action areas. This project proposes to conserve nearly 7000 acres of forest and 1.8 miles of shoreline on Port Gamble Bay – all of it currently under single ownership with a willing seller. The project addresses most (19 of 21) of PSP Action Agenda targets and encompasses two action areas (North Central and Hood Canal). Conservation actions with this high level of impact and urgency – the land is now zoned into 20-acre parcels and slated for development/sale beginning in 2013/2014 – are rare.

#### **Support of Forest Conservation Initiatives Demonstrating Landscape and Watershed Scale Approaches**

Great Peninsula Conservancy supports landscape- and watershed-scale forest conservation. On page 308, the Hood Canal Action Agenda identifies two groups of forest initiatives and differentiates them based on conservation approach and context:

- Permanent protection for forest and community values- Port Gamble/North Kitsap, Dabob Bay, Stavis
- Extinguishing development rights-Sustainable working forest and farms - Dosewallips, East Jefferson, Tahuya

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We have previously discussed the merits of the Port Gamble/Kitsap Forest & Bay Project above. Dabob Bay and Stavis are DNR projects within the Natural Heritage Program and rely on acquisition, land transfer and conservation of private/public lands within the NAP and NRCA boundaries. Current efforts underway to protect the Tahuya headwaters draw upon Forest Legacy funding to extinguish development rights while retaining timber rights for the landowner. Dosewallips is focused on protecting the complete watershed bridging public ownership with acquisition and conservation easements on private lands. East Jefferson considerations look at the matrix of private and public ownership differentiating between forest uses and aggregating larger blocks for conservation and protection.

Great Peninsula Conservancy believes that these examples represent a diversity of tactical approaches, and manifest the complexity of the challenge of conserving our forest lands. We support a targeted focus on those initiatives that *best evidence priority indicators of likely success for protection of high value habitat forest and conservation of valuable working lands*. This effort should be *local and regional delineating existing priority projects that are ready to go like Kitsap Forest and Bay Project (A2.1 NTA 5 and 6, page 483)* as well as forest conservation projects likely to emerge if economic incentives and funding to support upland forest conservation develop in the near future.

#### **Support of Forest Conservation Funding**

Conservation of upland forest is a challenging proposition given the limited amount of available funding. We fully support DNR's work with Congress to encourage passage of the Community Forestry Conservation Act (A2.1 NTA 3, page 483) and also encourage PSP to advocate *for full funding support of Washington's recently passed legislation, HB 1421- The Community Forest Trust Bill*. We believe that the physical scope of the Community Forest legislation should be expanded to include private forest land as well as those forests under DNR ownership, as opportunities for community forests bridge private and public lands.

Thank you for the opportunity to comment on Puget Sound Partnership's Action Agenda, and for your continued efforts to protect Puget Sound – one of Washington's signature natural wonders.

Sincerely,



Sandra Staples-Bortner  
Executive Director